

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLYSON ALBRECHT, individually and as)
mother and best friend of RORY-MORRIS)
MARTIN ALBRECHT, a minor,)

Plaintiff,)

v.)

KNOWLEDGE LEARNING CORPORATION,)
KNOWLEDGE LEARNING CENTERS, INC., KC)
DEVELOPMENT CORP., KINDERCARE REAL)
ESTATE L.L.C., KINDERCARE and MS.)
KATHERINE DOE,)

Defendants.)

Case No.

FILED: JULY 10, 2008

08CV3922

JUDGE KENDALL

MAGISTRATE JUDGE DENLOW

AEE

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441(a) and 1446(a), Defendants Knowledge Learning Corporation, KC Development L.L.C. (incorrectly named in Plaintiff's state-court Complaint as "KC Development Corp."), and Kindercare Real Estate L.L.C., hereby give notice of the removal of this action from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois.

This Court has jurisdiction over this case because original jurisdiction is proper under 28 U.S.C. § 1332(a). In support of this Notice of Removal, Defendants Knowledge Learning Corporation, KC Development L.L.C. (incorrectly named in Plaintiff's state-court Complaint as "KC Development Corp.") and Kindercare Real Estate L.L.C. state as follows:

PLAINTIFF'S ALLEGATIONS

1. Plaintiff filed her state-court Complaint in the Circuit Court of Cook County, Illinois, County Department, Law Division, bearing the above-captioned title and the docket

number 2008-L-006119. (See state-court Complaint attached to this Notice of Removal as Exhibit 1).

2. Plaintiff's state-court Complaint alleges that Knowledge Learning Corporation, Knowledge Learning Centers, Inc., KC Development L.L.C. (incorrectly named as "KC Development Corp."), Kindercare Real Estate L.L.C. and Kindercare are the owners and/or operators of a business commonly known as the trade name "Kindercare," a child care facility located at 1050 Bonaventure Drive, Elk Grove Village, Cook County, Illinois. **(Compl. at ¶ 1)**

3. Plaintiff's state-court Complaint alleges that Knowledge Learning Corporation, Knowledge Learning Centers, Inc., KC Development L.L.C. (incorrectly named as "KC Development Corp."), Kindercare Real Estate L.L.C., and Kindercare owed a duty of care to Rory-Morris Martin Albrecht and acted negligently when one of their employees, named in the Complaint as "KATHERINE DOE," tipped over a chair at the Elk Grove Village facility that struck and injured the child. **(Compl. ¶¶ 5-7)** These alleged negligent acts caused Plaintiff alleged damages in excess of \$100,000. **(Compl. Wherefore Clause)**

THE COURT HAS JURISDICTION UNDER 28 U.S.C. § 1332(a)

4. A defendant may remove an action to this Court if it has original jurisdiction over the action. *See* 28 U.S.C. § 1441(a).

5. This Court has original jurisdiction over this action under 28 U.S.C. § 1332(a):

The Parties Are of Diverse Citizenship

6. Plaintiff is a citizen of Illinois.

7. Defendant Knowledge Learning Corporation is incorporated under the laws of Delaware with its principal place of business in Portland, Oregon. So Knowledge Learning Corporation is a citizen of Delaware and Oregon. 28 U.S.C. § 1332(c)(1).

8. Defendant KC Development L.L.C. is incorrectly named in Plaintiff's state-court Complaint as "KC Development Corp." KC Development Corp. was converted from a corporation to a limited liability company on May 3, 2003. Defendant KC Development L.L.C. is a limited liability company organized under the laws of the State of Delaware. The sole member of KC Development L.L.C. is KinderCare Learning Centers, Inc., which is incorporated under the laws of Delaware with its principal place of business in Portland, Oregon. So KC Development L.L.C. is a citizen of Delaware and Oregon. *Thomas v. Guardsmark, LLC*, 487 F.3d 531, 534 (7th Cir. 2007) ("For diversity jurisdiction purposes, the citizenship of an LLC is the citizenship of each of its members).

9. Defendant KinderCare Real Estate L.L.C. is a limited liability company organized under the laws of the State of Delaware. The sole member of KinderCare Real Estate L.L.C. is KinderCare Learning Centers, Inc., which is incorporated under the laws of Delaware with its principal place of business in Portland, Oregon. So KinderCare Real estate L.L.C. is a citizen of Delaware and Oregon. *Id.*

10. The defendant named in Plaintiff's state-court Complaint as "Knowledge Learning Centers, Inc." is not an entity. However, there is a wholly owned subsidiary of defendant Knowledge Learning Corporation named "KinderCare Learning Centers, Inc.," which is incorporated under the laws of Delaware with its principal place of business in Portland, Oregon. So to the extent Plaintiff intends to bring suit against KinderCare Learning Centers, Inc., it is a citizen of Delaware and Oregon. 28 U.S.C. § 1332(c)(1).

11. The defendant named in Plaintiff's state-court Complaint as "KinderCare" is not an entity. So the non-entity "KinderCare" does not bear on the Court's original jurisdiction over this matter.

12. Defendant "KATHERINE DOE" is a defendant sued under a fictitious name. So for purposes of removal, the citizenship of "KATHERINE DOE" is to be disregarded. 28 U.S.C. § 1441(a).

The Amount in Controversy Exceeds \$75,000

13. Plaintiff alleges in her state-court Complaint that the Defendants negligently breached a duty of care to the minor child which resulted in damages in an amount "exceeding \$100,000." (**Compl. Wherefore Clause**)

THE STATUTORY REQUIREMENTS OF 28 U.S.C. § 1446 HAVE BEEN SATISFIED

14. Defendants Knowledge Learning Corporation, KC Development L.L.C. and Kindercare Real Estate L.L.C. were served with the Complaint no earlier than June 10, 2008. So this Notice of Removal is timely. 28 U.S.C. §1446(b).

15. Defendants Knowledge Learning Corporation, KC Development L.L.C. and Kindercare Real Estate L.L.C. are filing with this pleading a copy of the state-court Complaint and Summons served upon them in the state-court action. 28 U.S.C. § 1446(a). A copy of the state-court Complaint is attached as Exhibit 1 to this Notice of Removal. A copy of the Summons is attached as Exhibit 2 to this Notice of Removal.

16. Promptly after the filing of this Notice of Removal, Defendants Knowledge Learning Corporation, KC Development L.L.C. and Kindercare Real Estate L.L.C. will give written notice of this Notice of Removal to Plaintiff. 28 U.S.C. § 1446(d).

17. Promptly after the filing of this Notice of Removal, Defendants Knowledge Learning Corporation, KC Development L.L.C. and Kindercare Real Estate L.L.C. will file a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County Illinois, County Department, Law Division. 28 U.S.C. § 1446(d).

Dated: July 10, 2008

Respectfully submitted,

**KNOWLEDGE LEARNING CORPORATION,
KC DEVELOPMENT L.L.C., and
KINDERCARE REAL ESTATE L.L.C.**

/s/ Timothy L. Binetti
Todd A. Rowden
Timothy L. Binetti
THOMPSON COBURN LLP
55 East Monroe Street
Chicago, IL 60603
Tel: (312) 580-2327

LIST OF EXHIBITS

- Exhibit 1 Complaint filed with the Circuit Court of Cook County, Illinois, County Department, Law Division and served on Defendants Knowledge Learning Corp., KC Development L.L.C. and Kindercare Real Estate L.L.C.
- Exhibit 2 Summons filed with the Circuit Court of Cook County, Illinois, County Department, Law Division and served on Defendants Knowledge Learning Corp., KC Development L.L.C. and Kindercare Real Estate L.L.C.

CERTIFICATE OF SERVICE

I certify that, pursuant to Fed. R. Civ. P. 5(a), a copy of the **Notice of Removal** was served by deposit into the United States Mail, first-class, postage pre-paid upon the following on July 10, 2008:

Joseph G. Klest
1701 E. Woodfield Road, Suite 909
Schaumburg, IL 60173
(847) 969-9510 (phone)

/s/ Timothy L. Binetti

EXHIBIT 1

STATE OF ILLINOIS)

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LAW DIVISION

ALLYSON ALBRECHT, individually)
and as mother and best friend of)
RORY-MORRIS MARTIN ALBRECHT,)
a minor,)

Plaintiff,)

vs.)

No.)

KNOWLEDGE LEARNING CORP,)
KNOWLEDGE LEARNING CENTERS,)
INC, KC DEVELOPMENT CORP.,)
KINDERCARE REAL ESTATE LLC.,)
KINDERCARE AND MS. KATHERINE)
DOE)

Defendants.)

2008JUN06119
CALENDAR/ROOM X
TIME 00:00
PI Other

COMPLAINT

NOW COMES the Plaintiff, ALLYSON ALBRECHT, individually and as mother and best friend of RORY-MORRIS MARTIN ALBRECHT, and in complaining of the Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE AND MS. KATHERINE DOE, states as follows:

COUNT I

1. That at all times mentioned herein, one or more of the following Defendants KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., and KINDERCARE, owned and or operated business commonly know as Kindercare a child care facility located at 1050 Bonaventure Drive, Elk Grove Village, IL.

2. That the Defendants have refused to disclose the full name of MS. KATHERINE _____ so she is identified as KATHERINE DOE.

3. That on or about December 13, 2007 the minor Plaintiff, RORY-MORRIS MARTIN ALBRECHT, was in the care of one or more of the following Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE and MS. KATHERINE DOE on the Kindercare premises located at 1050 Bonaventure Drive, Elk Grove Village, IL .

4. That at all times mentioned MS. KATHERINE DOE was the employee and agent of one or more of the Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE .

5. That at the same time and place, Ms. Katherine Doe tripped and fell and knocked a chair onto the minor, RORY-MORRIS MARTIN ALBRECHT injuring him.

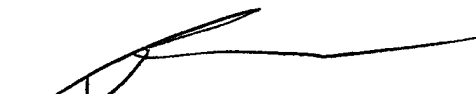
6. That the Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP.,KINDERCARE REAL ESTATE LLC., KINDERCARE AND MS. KATHERINE DOE had a duty to use due care and caution for the minor Plaintiff.

7. That MS. KATHERINE DOE and/or other agents of one of the defendants was negligent in one or more of the following ways:

- a) Tripped and fell knocking a chair over onto the Plaintiff's head.
- b) Failed to seek immediate care for the Plaintiff and his injuries.
- c) Failure to timely notify Allyson Albrecht of her sons injuries.
- d) Were otherwise careless or negligent.

That as a direct and proximate result of the negligence of the defendants the minor Plaintiff, RORY, has suffered a seizure and, has incurred medical bills, and will incur medical bills in the future.

WHEREFORE, the Plaintiff, ALLYSON ALBRECHT, individually and as mother and best friend of RORY-MORRIS MARTIN ALBRECHT, a minor, demands judgment against one or more of the Defendants, KNOWLEDGE LEARNING CORP.; KNOWLEDGE LEARNING CENTERS, INC.; KC DEVELOPMENT CORP.; KINDERCARE REAL ESTATE LLC.; KINDERCARE AND MS. KATHERINE DOE in an amount sufficient to compensate for his injuries and medical bills in an amount in excess of One Hundred Thousand Dollars (\$100,000).



JOSEPH G. KLEST, Attorney for Plaintiff

JOSEPH G. KLEST
1701 E. Woodfield Road, Ste. 909
Schaumburg, IL 60173
(847) 969-9510
Attorney No. 50239

EXHIBIT 2

CT CORPORATION
A WoltersKluwer Company

**Service of Process
Transmittal**

06/10/2008
CT Log Number 513512113



TO: John Sims, General Counsel
Kindercare Learning Centers, Inc.
650 NE Holladay St., Suite 1400
Portland, OR 97232-

RE: Process Served in Illinois

FOR: Knowledge Learning Corporation (Domestic State: DE)

Received

JUN 12 2008

Legal

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Allyson Albrecht, individually and as mother and best friend of Rory-Morris Martin Albrecht, a minor, Pltf. vs. Knowledge Learning Corp., et al., Dfts.
Name discrepancy noted.

DOCUMENT(S) SERVED: Summons (2 sets), Complaint, Service List (2 sets)

COURT/AGENCY: Cook County Circuit Court - Cook County Department - Law Division, IL
Case # 2008 L 006119

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 12/13/2007 at 1050 Bonaventure Drive, Elk Grove Village IL - Seeking \$100,000.00

ON WHOM PROCESS WAS SERVED: C T Corporation System, Chicago, IL

DATE AND HOUR OF SERVICE: By Process Server on 06/10/2008 at 10:30

APPEARANCE OR ANSWER DUE: Within 30 days, not counting the day of service

ATTORNEY(S) / SENDER(S): Joseph G. Klest
1701 East Woodfield Road
Suite 909
Schaumburg, IL 60173
847-969-9510

ACTION ITEMS: SOP Papers with Transmittal, via Fed Ex 2 Day, 790523539690
Email Notification, Kelly Johnson kjohnson@klcorp.com
Email Notification, Gena King gking@klcorp.com
Email Notification, Tanya Conrad tconrad@klcorp.com

SIGNED: C T Corporation System
PER: Tawana Carter
ADDRESS: 208 South LaSalle Street
Suite 814
Chicago, IL 60604
TELEPHONE: 312-345-4336

Page 1 of 1 / DS

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

CCG N001-10M-1-07-05 ()

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, Law DIVISION

(Name all parties)

ALLYSON ALBRECHT, INDIVIDUALLY & AS MOTHER

v.

KNOWLEDGE LEARNING CORP., KNOWLEDGE LEARN
 ING CENTERS, INC. KC DEVELOPMENT CORP., KINDER
 CARE REAL ESTATE LLC., KINDERCARE AND
 MS. KATHERINE DOE

No. _____

SHERIFF: PLEASE SERVE
 ALL DEFENDANTS ON ATTACHED
 SERVICE LIST

SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room _____, Chicago, Illinois 60602

☐ District 2 - Skokie
 5600 Old Orchard Rd.
 Skokie, IL 60077

☐ District 3 - Rolling Meadows
 2121 Euclid
 Rolling Meadows, IL 60008

☐ District 4 - Maywood
 1500 Maybrook Ave.
 Maywood, IL 60153

☐ District 5 - Bridgeview
 10220 S. 76th Ave.
 Bridgeview, IL 60455

☐ District 6 - Markham
 16501 S. Kedzie Pkwy.
 Markham, IL 60426

☐ Child Support
 28 North Clark St., Room 200
 Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 50239

Name: JOSEPH G. KLEST

Atty. for: PLAINTIFFS

Address: 1701 E. WOODFIELD ROAD, SUITE 909

City/State/Zip: SCHAUMBURG, IL 60173

Telephone: 847-969-9510

Service by Facsimile Transmission will be accepted at: _____

WITNESS, _____

Clerk of Court

Date of service: _____
 (To be inserted by officer on copy left with defendant
 or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

STATE OF ILLINOIS
COUNTY OF COOK

)
)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

ALLYSON ALBRECHT, individually)
and as mother and best friend of)
RORY-MORRIS MARTIN ALBRECHT,)
a minor,)

Plaintiff,)

vs.)

No.)

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KNOWLEDGE LEARNING CENTERS,)
INC, KC DEVELOPMENT CORP.,)
KINDERCARE REAL ESTATE CORP.,)
KINDERCARE REAL ESTATE LLC.,)
KINDERCARE AND MS. KATHERINE)
DOE)

Defendants.)

SERVICE LIST

KNOWLEDGE LEARNING CORP,
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KNOWLEDGE LEARNING CORP,
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KNOWLEDGE LEARNING CENTERS
INC,
c/o CT Corporation System
8 S. LaSalle Street, Suite 814
Chicago, IL 60604

KNOWLEDGE LEARNING CENTERS
INC,
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KC DEVELOPMENT CORP.,
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KC DEVELOPMENT CORP.,
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KINDERCARE REAL ESTATE LLC.
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KINDERCARE REAL ESTATE LLC.
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KINDERCARE LLC
1050 Bonaventure Drive
Elk Grove Village, IL 60007

MS. KATHERINE DOE
C/O KINDERCARE
1050 Bonaventure Drive
Elk Grove Village, IL 60007

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

CCG N001-10M-1-07-05 ()

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, Law DIVISION

(Name all parties)

ALLYSON ALBRECHT, INDIVIDUALLY & AS MOTHER

v.

KNOWLEDGE LEARNING CORP., KNOWLEDGE LEARN
 ING CENTERS, INC. KC DEVELOPMENT CORP., KINDER
 CARE REAL ESTATE LLC., KINDERCARE AND
 MS. KATHERINE DOE

No. _____

SHERIFF: PLEASE SERVE
 ALL DEFENDANTS ON ATTACHED
 SERVICE LIST

SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- | | | |
|---|---|---|
| <input type="checkbox"/> Richard J. Daley Center, 50 W. Washington, Room _____, Chicago, Illinois 60602 | | |
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
1500 Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60426 | <input type="checkbox"/> Child Support
28 North Clark St., Room 200
Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

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Atty. No.: 50239

Name: JOSEPH G. KLEST

Atty. for: PLAINTIFFS

Address: 1701 E. WOODFIELD ROAD, SUITE 909

City/State/Zip: SCHAUMBURG, IL 60173

Telephone: 847-969-9510

Service by Facsimile Transmission will be accepted at: _____

WITNESS, _____

Clerk of Court

Date of service: _____

(To be inserted by officer on copy left with defendant
 or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

STATE OF ILLINOIS
COUNTY OF COOK

)
)
)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
LAW DIVISION**

ALLYSON ALBRECHT, individually)
and as mother and best friend of)
RORY-MORRIS MARTIN ALBRECHT,)
a minor,)
Plaintiff,)

vs.

No.

KNOWLEDGE LEARNING CORP,)
KNOWLEDGE LEARNING CENTERS,)
INC, KC DEVELOPMENT CORP.,)
KINDERCARE REAL ESTATE CORP.,)
KINDERCARE REAL ESTATE LLC.,)
KINDERCARE AND MS. KATHERINE)
DOE)
Defendants.)

SERVICE LIST

KNOWLEDGE LEARNING CORP,
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KNOWLEDGE LEARNING CORP,
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

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c/o CT Corporation System
8 S. LaSalle Street, Suite 814
Chicago, IL 60604

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Any Agent at
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Elk Grove Village, IL 60007

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c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KC DEVELOPMENT CORP.,
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KINDERCARE REAL ESTATE LLC.
c/o CT Corporation System
208 S. LaSalle Street, Suite 814
Chicago, IL 60604

KINDERCARE REAL ESTATE LLC.
Any Agent at
1050 Bonaventure Drive
Elk Grove Village, IL 60007

KINDERCARE LLC
1050 Bonaventure Drive
Elk Grove Village, IL 60007

MS. KATHERINE DOE
C/O KINDERCARE
1050 Bonaventure Drive
Elk Grove Village, IL 60007